

MEMO ENDORSED

PETER J. GLEASON, PC

PETER J. GLEASON
ATTORNEY AT LAW

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935 SOUTH LAKE BLVD.
SUITE 17
MAHOPAC, NEW YORK 10541
(646) 872-3546
FAX: (212) 431-3378
PJGLEASON@AOL.COM

May 11, 2018

VIA ECF

United States District Judge Kimba M. Wood
US District Court for the Southern District of New York
US Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Michael D. Cohen v. United States of America*, 18-MJ-3161 (KMW)

Dear Judge Wood,

In light of the recent developments regarding the former New York State Attorney General Eric Schneiderman, a protective order is requested regarding any and all records that may be contained in the seized files of Mr. Cohen regarding my discussions with Mr. Cohen concerning two women that were sexually victimized by Mr. Scheinderman.

By way of history my law office has an open door policy for any individual who has been victimized by entities that because of their status and power are able to destroy lives with impunity.

My office was contacted some years ago by two unrelated women who at two separate times (approximately 1 year apart) claimed that Mr. Scheiderman was sexually inappropriate with them.

After the first consultation with one of Scheinderman's victims I explained to her how invariably the very entities that were established to protect her would ultimately turn on her to protect the power elite that includes Scheinderman.

Approximately one year later, sometime in 2013, another woman contacted my office with an almost identical story on how she too was victimized by Scheinderman. At first glance the logical recommendation would have been to report this matter to the Manhattan District Attorney. Unfortunately, I had to advise this woman against reporting the incident to the Manhattan District Attorney Office

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based on my past experience in reporting prima facie political corruption that was ignored by the office, some of which were ultimately prosecuted elsewhere.

At a minimum, I wanted these women to realize that somebody believed them, and that their horrific experiences at the hands of Scheinderman would not be brushed under the rug.

I discussed the matter with a retired journalist by the name of Stephen Dunleavy who suggested and offered to discuss the matter with Donald Trump. Mr. Dunleavy did indeed discuss this very matter with Mr. Trump as evidenced by a phone call I received from Attorney Michael Cohen.

During my communications with Mr. Cohen I shared with him certain details of Scheinderman's vile attacks on these two women.

The extent of Mr. Cohen memorializing any of our communications is unknown. However, these two women's confidentiality, as victims of a sexual assault, should be superior to that of any unrelated subpoena.

Furthermore, the letter to the Court dated May 9, 2018, raises concerns of what appears to be reckless behavior on the part of Mr. Avenatti, particularly in the event his client should be given leave to intervene.

Based on the foregoing, it is respectfully requested that the Court issue a protective order and seal any and all correspondence that Mr. Cohen may have memorialized regarding our communications which pertain to Mr. Scheinderman's assault on these two women.



Peter J. Gleason

PJG/ep

Mr. Gleason is directed to file a memorandum of law in support of the request stated above, by May 18, 2018, or to withdraw the request.

5-11-18
SO ORDERED, N.Y., N.Y.
Kimberly M. Wood
KIMBERLY M. WOOD
U.S.D.J.